

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHER DISTRICT OF MARYLAND**

**SCOTT PAPER, LTD.**

**Plaintiff**

**v.**

**AGM ALTERNATIVES, INC.**

**Defendant**

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**Civil No.: AMD 02-1980**

**DEFENDANT'S REQUEST FOR POSTPONEMENT OF TRIAL DATE**

Defendant, AGM Alternatives, Inc., by its attorneys, Steven R. Freeman, Craig M. Schwartz and Freeman, Wolfe & Greenbaum, P.A., hereby files this Request For Postponement of the trial in this matter which has been scheduled for Wednesday and Thursday, April 23 & 24, 2003 and as reasons therefore state:

1. Defendant's counsel, Steven R. Freeman, is scheduled to appear in the Circuit Court for Baltimore County in the matter of *Joseph Lepetich v. Lee C. Parsons*, Case No.: 03-C-01-2302 on April 23, 2003 for the commencement of a two (2) day trial. This trial date has been set in as an agreed upon trial date between the counsel in this case. The Plaintiff in the matter is from California and is traveling to Maryland for the case on April 23 and 24, 2003. The matter previously been postponed on two (2) occasions. A copy of the trial notice of this matter is attached hereto as Exhibit No. 1.
2. Defendant's counsel has notified counsel for the Plaintiff in this matter of the conflict but has not had the consent of counsel regarding this postponement request.
3. This is Defendant's first request for postponement of the trial of this matter.

4. Defendant's request will not prejudice any of the parties to this matter.
5. Defendant's request is not for purposes of delay.

WHEREFORE, Defendant, AGM Alternatives, Inc., by its attorneys, respectfully request that the trial scheduled for April 23 and 24, 2003 be postponed and rescheduled as soon as possible thereafter.

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STEVEN R. FREEMAN

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CRAIG M. SCHWARTZ

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FREEMAN, WOLFE & GREENBAUM, P.A.  
409 Washington Avenue, Suite 300  
Towson, Maryland 21204  
(410) 321-8400

Attorneys for Defendant,  
AGM Alternatives, Inc.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this \_\_\_\_ day of March, 2003, a copy of the foregoing Request for Postponement was sent by first-class mail, postage prepaid, to: David Cynamon, Alan S. Cooper, Nancy S. Lapidus, Jonathan W. Gannon, Shaw Pittman, LLP, 2300 N Street, N.W., Washington, D. C. 20037.

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STEVEN R. FREEMAN

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**ORDER**

UPON CONSIDERATION of Defendant's Request for Postponement, and any responses filed thereto, it is this \_\_\_\_ day of \_\_\_\_\_, 2003, by the UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND, hereby

ORDERED, that the Defendant's Request For Postponement for the trial scheduled for April 23 and 24, 2003, be and hereby is GRANTED; and it is further

ORDERED, that the new trial date shall be set for the \_\_\_\_ day of \_\_\_\_\_, 200\_\_.

\_\_\_\_\_  
JUDGE,  
United States District Court

cc: All counsel of record